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ATTORNEYS FOR DEFENDANTS

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

15 GLORIA PLASCENCIA-DE HARO,) No. C 3:17-cv-02079-LB
16)
17 Plaintiff,) **STIPULATION TO CONTINUE**
18) **CASE MANAGEMENT**
19) **CONFERENCE AND TO EXTEND**
20) **TIME TO RESPOND TO**
21 JOHN F. KELLY, et al.,) **COMPLAINT**
22)
23)
24 Defendants.)

Pursuant to Local Rules 6-2 and 7-12, Plaintiff Gloria Plascencia-De Haro (“Plaintiff”) and Defendants John F. Kelly, et al. (“Defendants” and collectively with Plaintiff, the “Parties”) stipulate as follows:

26 This is an immigration case arising under the Administrative Procedure Act,
27 5 U.S.C. § 701, in which Plaintiff challenges the denial by United States

UNITED STATES DEPARTMENT OF JUSTICE, CIVIL DIVISION
OFFICE OF IMMIGRATION LITIGATION
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1 Citizenship and Immigration Services of Plaintiff's application for adjustment of
2 status to permanent residence.

3 Defendants' deadline to answer or otherwise respond to the Complaint in
4 this action is currently June 23, 2017.

5 On April 14, 2017, the Court entered an Order Setting Initial Case
6 Management Conference and ADR Deadlines ("Order"), ECF No. 4. The Order
7 scheduled an initial case management conference ("CMC") for July 13, 2017.

8 The Parties have agreed to pursue additional administrative remedies that
9 may obviate the need for further litigation. The Parties are this day filing a Notice
10 of Need for ADR Phone Conference in which they are requesting an Early
11 Settlement Conference with a Magistrate Judge. At that Early Settlement
12 Conference, the parties intend to discuss the potential administrative remedies
13 further with the Magistrate Judge.

14 To permit the Parties to do so without burdening them or the Court with
15 additional filings or conferences, the Parties respectfully request and stipulate to an
16 order continuing the CMC until July 20, 2017. For the same reason, the Parties
17 respectfully request and stipulate to an order extending the Parties' time to answer
18 or respond to the Complaint by twenty-one days, from June 23, 2017, until and
19 including July 21, 2017.

20 Undersigned counsel for Defendants attests he obtained the concurrence in
21 the filing of the document from the other electronic signatory to this stipulation.

22 This is the first request for modification of time in this action.

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1 Dated: June 22, 2017

2 LAW OFFICE OF
3 ROBERT L. LEWIS

4 /s/ Kevin Michael Crabtree
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Respectfully submitted,

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 06/23/2017


HON. LAUREL BEELER
United States Magistrate Judge